

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SPECTRUM LABORATORIES, LLC,
Plaintiff,

v.

URZ TRENDZ, LLC,
Defendant.

Case No. 4:22-CV-03705

Hon. Judge Charles Eskridge

JURY TRIAL DEMANDED

DECLARATION OF MUHAMMAD MUJAHID

I, Muhammad Mujahid, declare as follows:

1. I submit this declaration in support of Defendant URZ Trendz, LLC’s (“Defendant”) Opposition to the Motion for Sanctions filed by Plaintiff Spectrum Laboratories, LLC (“Plaintiff”). I have personal knowledge of the matters set forth below, and if called as a witness, I would and could competently testify thereto.

2. I was retained by Defendant for the purpose of facilitating its compliance with the Court’s forensic discovery order (ECF No. 111).

3. On or around July 5, 2024, I was informed by Defendant that I had to be at Defendant’s facility by 6pm on Monday, July 8, 2024, to facilitate Defendant’s compliance with the Court’s forensic discovery order.

4. In the morning of July 8, 2024, I confirmed with Defendant that I would be present at its facility by 5pm that day to prepare for Plaintiff’s execution of the Court’s forensic discovery order that day at 6pm.

5. I arrived at Defendant’s facility on July 8, 2024, at 5pm. Upon my arrival, I was given three (3) cellular phones along with the passwords and other credentials for said phones. I informed by Defendant that the phones were in good working order. I was informed by Defendant that the passwords and other credentials were sufficient for forensic copying and searching.

6. Upon my arrival, I was also given the passwords and other credentials to two (2) email accounts. I confirmed that the passwords and other credentials were sufficient to gain access to the email accounts. I was informed by Defendant that the passwords and other credentials were sufficient for forensic copying and searching.

7. Upon my arrival, I was also shown the location of two (2) computers and I was provided with the passwords and other credentials for said computers. I was informed by Defendant that the computers were in good working order. I was informed by Defendant that the passwords and other credentials were sufficient for forensic copying and searching.

8. Upon my arrival, I was also shown the location of all of Defendant's business records and I was given access to all Defendant's facility.

9. By 6pm on July 8, 2024, I was fully prepared to facilitate Defendant's compliance with the Court's forensic discovery order.

10. At 6pm on July 8, 2024, I waited for Plaintiff or Plaintiff's representatives to show up to execute the Court's forensic discovery order. However, nobody showed up.

11. I waited for Plaintiff or Plaintiff's representative for 1.5 hours until 7:30pm, but nobody showed up.

12. I contacted Defendant to inform that nobody showed up and that I was leaving at 7:30pm.

13. I left Defendant's facility at 7:30pm on July 8, 2024.

14. Then on or around August 7, 2024, I was informed by Defendant that I had to be at Defendant's facility by 6pm on Thursday, August 8, 2024, to facilitate Defendant's compliance with the Court's forensic discovery order.

15. As before, in the morning of August 8, 2024, I confirmed with Defendant that I would be present at its facility by 5pm that day to prepare for Plaintiff's execution of the Court's forensic discovery order that day at 6pm.

16. I arrived at Defendant's facility on August 8, 2024, at 5pm. Upon my arrival, I was given three (3) cellular phones along with the passwords and other credentials for said phones. I was informed by Defendant that the phones were in good

working order. I was informed by Defendant that the passwords and other credentials were sufficient for forensic copying and searching.

17. Upon my arrival, I was also given the passwords and other credentials to two (2) email accounts. I confirmed that the passwords and other credentials were sufficient to gain access to the email accounts. I was informed by Defendant that the passwords and other credentials were sufficient for forensic copying and searching.

18. Upon my arrival, I was also shown the location of two (2) computers and I was provided with the passwords and other credentials for said computers. I was informed by Defendant that the computers were not working properly.

19. Upon my arrival, I was also shown the location of all of Defendant's business records and I was given access to all Defendant's facility.

20. By 6pm on August 8, 2024, I was fully prepared to facilitate Defendant's compliance with the Court's forensic discovery order.

21. At around 6pm on August 8, 2024, two (2) of Plaintiff's representatives arrived at Defendant's facilities. One identified himself as an attorney and the other identified himself as a computer expert.

22. Upon their arrival, I provided the computer expert the three (3) cellular phones and the corresponding passwords and other credentials. I also made sure that the computer expert had access to the phones. The computer expert confirmed to me that he had sufficient access to the phones for forensic copying and searching.

23. I then provided the computer expert with the information for the two (2) email accounts, including the passwords and other credentials. I also made sure that the computer expert had access to both email accounts. The computer expert confirmed to me that he had sufficient access to the email accounts for forensic copying and searching.

24. Then, when I showed the computer expert the two (2) computers, the computer expert indicated that arrangements were made for him to take the computers to his laboratory for further testing and analysis. I provided the computer expert the passwords and other credentials to the computers but the computer expert did not want to work on the computers or test whether the passwords and other credentials were

sufficient for forensic copying and searching.

25. Then the computer expert confirmed to me that I had given him everything he needed and began working on the email accounts first.

26. Then, I turned to the attorney and provided him access to all of Defendant's facilities and to all of Defendant's business records.

27. I also informed the attorney that I was there to provide assistance in locating and examining any of Defendant's records.

28. The attorney then confirmed to me that I had given him everything he needed and began conducting a thorough physical inspection of Defendant's facilities and business records.

29. I made sure that both the computer expert and the attorney knew that they could stay at Defendant's facilities for as long as they needed. I even offered to order dinner for them. They both orally confirmed to me that they knew there were no time limitations and assured me that they would stay until their work was completed. I also informed them that my job was to make sure they had everything they needed to fully execute the Court's forensic discovery order. I made sure they knew that I was there to support them in any way needed.

30. Both the computer expert and the attorney were at Defendant's facilities until around 11pm doing their work.

31. At around 11pm, both the computer expert and attorney informed me that they had completed their work and would leave Defendant's facilities.

32. Before the attorney left, I received oral confirmation from him that he had completed his physical inspection of all of Defendant's facilities and business records.

33. Before the computer expert left, I received oral conformation from him that he had completed his forensic copying and searching of the phones and emails, but not the computers. The computer expert informed me that he needed and had made arrangements to take the two (2) computers to his laboratory for further analysis. Upon confirming as such with Defendant, I allowed the computer expert to take the two (2) computers.

34. I then left Defendant's facilities and provided Defendant an update.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 20th day of September, 2024, at Houston, Texas.

Muhammad Mujahid
Muhammad Mujahid